

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.¹

PROMESA

Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”),

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**INFORMATIVE MOTION SUBMITTING REDACTED EXHIBITS
PURSUANT TO THE COURT’S MAY 7, 2020 ORDER (ECF NO. 13067)**

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Ambac², Assured, National, FGIC, The Bank of New York Mellon, in its capacity as successor trustee for the CCDA bondholders, and U.S. Bank, in its capacity as successor trustee for the PRIFA bondholders (collectively, “Movants”) by and through their undersigned attorneys, respectfully submit this informative motion (the “Motion”) submitting certain exhibits related to the Lift Stay Motions (the “Lift Stay Motions”) in compliance with the *Order Granting Motion* (ECF No. 13067,³ and ECF No. 798 in Case No. 17-3567). In further support of this Motion, Movants respectfully state as follows:

1. On April 30, 2020, Movants filed certain exhibits in connection with counsel declarations supporting the Lift Stay Motions. The following exhibits contained financial account numbers, which should have been redacted in part, pursuant to Fed. R. Bankr. P. 9037(a)(4):

- a. Exhibit 66 to the Declaration of William Natbony (originally filed as ECF No. 13004-71 and as ECF No. 780-71 in Case No. 17-3567 and redacted version attached hereto as Exhibit A);
- b. Exhibit 39 to the Declaration of Atara Miller (originally filed as ECF No. 12998-15, and redacted version attached hereto as Exhibit B); and
- c. Exhibits 38, 41, 42, and 45 to the Declaration of John J. Hughes, III (originally filed as ECF Nos. 13007-19, 13007-22, 13007-23, and 13007-26, and redacted versions attached hereto as Exhibits C-F, respectively).

2. The unredacted versions of the aforementioned exhibits have since been removed from the public filing system, as required by Fed. R. Bankr. P. 9037(h)(2).

² Unless otherwise specified, defined terms have the meanings given to them in the *Stipulation and Protective Order* (ECF No. 12912) (the “Protective Order”) and Lift Stay Motions.

³ “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

3. On May 6, 2020, Movants submitted the *Motion of Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, Financial Guaranty Insurance Company, The Bank of New York Mellon, and U.S. Bank Trust National Association to Redact Previously Filed Documents Pursuant to Federal Rule of Bankruptcy Procedure 9037(H)* (ECF No. 13047, and ECF No. 792 in Case No. 17-3567) (the “Motion to Redact”) seeking to file redacted versions of the exhibits.

4. On May 7, 2020 the Court granted the Motion to Redact. *Order Granting Motion* (ECF No. 13067, and ECF No. 798 in Case No. 17-3567).

5. Pursuant to Fed. R. Bankr. P. 9037(h), Movants now file this informative motion submitting the redacted exhibits attached hereto as **Exhibits A-F**.

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Dated: May 8, 2020
San Juan, Puerto Rico

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CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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